

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

DELMY PINEDA CRUZ, et al.,)	
)	
Plaintiffs,)	
v.)	Civil Action No. SA-15-CV-326-XR
)	
ROSE THOMPSON,)	
Warden, Karnes County)	
Residential Center, et al.)	
)	
Defendants.)	


DECLARATION OF GABRIEL PACHECO

Pursuant to 28 U.S.C. § 1746, I, Gabriel Pacheco, do hereby declare:

1. My name is Gabriel Pacheco. I am a Deportation Officer for the Department of Homeland Security, Immigration and Customs Enforcement, Enforcement and Removal Operations, assigned to the Karnes County Residential Center (KCRC). I have served in that capacity since January 1, 2012. Prior to this assignment, I was an Immigration Enforcement Agent with Immigration and Customs Enforcement at the San Antonio Field Office for five years.
2. As a Deportation Officer at Karnes County Residential Center (KCRC), I am responsible for case dockets and am familiar with the bond and release of residents at Karnes County Residential Center (KCRC). As part of my official duties I have access to, and regularly use Department of Homeland Security systems that contain the bond and release status of every resident housed at Karnes County Residential Center (KCRC).
3. The statements contained in this declaration are based upon my personal knowledge or upon information provided to me in my official capacity.
4. In particular I have knowledge of the dates and conditions of release from ICE custody of Delmy Pineda Cruz (Pineda Cruz); Polyane Soares De Oliveira Dos Santos (Soares De Oliveira Dos Santos) and Lilian Castillo Rosado (Castillo Rosado) and their children.

5. On May 15, 2015 Castillo Rosado and her son, J [REDACTED] C [REDACTED] C [REDACTED] were released from ICE custody at KCRC following a hearing in which an immigration judge granted Castillo-Rosado withholding of removal and her son, asylum.
6. On June 11, 2015, Pineda Cruz was released from ICE custody at KCRC after Pineda Cruz posted a \$5, 500 Immigration bond. Her son, A [REDACTED] L [REDACTED] P [REDACTED] was released on his own recognizance to accompany his mother.
7. On June 12, 2015, Soares De Oliveira Dos Santos was released from ICE custody at KCRC after Soares-De Oliveira Dos Santos posted an \$8,000 immigration bond. Her daughter, R [REDACTED] D [REDACTED] was released from ICE custody in her own recognizance to accompany her mother.
8. I declare, under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed on this 19 th day of June, 2015.



Gabriel Pacheco
Deportation Officer
Enforcement and Removal Operations
U.S. Immigration and Customs Enforcement
U.S. Department of Homeland Security